

Juvenile Law Center

www.JLC.org • **Advancing the rights and well-being of children in jeopardy** • Founded 1975
The Philadelphia Building • 1315 Walnut Street, 4th Floor • Philadelphia, PA 19107 • (215) 625-0551 • FAX: (215) 625-2808 • in PA: (800) 875-8887

April 8, 2003

Mary E. D'Andrea
Clerk of Court
United States District Court
Middle District of Pennsylvania
William J. Nealon Federal Building & U.S. Courthouse
235 N. Washington Ave., P.O. Box 1148
Scranton, PA 18501

BY FIRST CLASS MAIL

RE: A.M. v. Luzerne County Juvenile Detention Center et al.
Civil Action No. 3:CV-01-1276 (Judge Caputo)

**Outstanding Exhibit to Schedule of Exhibits in Support of
Plaintiff's Brief in Opposition to Motion for Summary Judgment of Defendants
Luzerne County Juvenile Detention Center, Brulo, Kwarcinski, Prawdzik, Traver,
Parker, Considine and Yozviak (Docket # 82). Plaintiff's Brief in Opposition to
Defendant Puffenberger's Motion for Summary Judgment (Docket # 80), and
Plaintiff's Responses to Defendants' Statements of Undisputed Material Facts
Pursuant to Local Rule 56.1**

To the Clerk of Court:

Please find enclosed for filing in the above-captioned matter Exhibit #61 (Deposition of Jerome Prawdzik dated 8/20/02) to the Schedule of Exhibits in Support of the above-named documents. We mistakenly forgot to include this exhibit with those that we mailed to you yesterday. (See attached letter to you dated April 7, 2003.)

If you have any questions, please contact attorney Rosado at 215-625-0551. Thank you for your attention to this matter.

STAFF:

Robert G. Schwartz, Esq.
Marsha L. Levick, Esq.
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Directors Emeritus
Stuart W. Kline
Sol E. Zubrow
(1976-1993)

Sincerely,

A handwritten signature in black ink, appearing to read 'La M', with a long horizontal flourish extending to the right.

Marsha Levick, Esq.
Lourdes Rosado, Esq.
ATTORNEYS FOR PLAINTIFF

Attachment
Enclosure

Juvenile Law Center

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April 7, 2003

Mary E. D'Andrea
Clerk of Court
United States District Court
Middle District of Pennsylvania
William J. Nealon Federal Building & U.S. Courthouse
235 N. Washington Ave., P.O. Box 1148
Scranton, PA 18501

BY UPS OVERNIGHT MAIL

RE: **A.M. v. Luzerne County Juvenile Detention Center et al.**
Civil Action No. 3:CV-01-1276 (Judge Caputo)

**Outstanding Exhibits to Schedule of Exhibits in Support of
Plaintiff's Brief in Opposition to Motion for Summary Judgment of Defendants
Luzerne County Juvenile Detention Center, Brulo, Kwarcinski, Prawdzik, Traver,
Parker, Considine and Yozviak (Docket # 82). Plaintiff's Brief in Opposition to
Defendant Puffenberger's Motion for Summary Judgment (Docket # 80), and
Plaintiff's Responses to Defendants' Statements of Undisputed Material Facts
Pursuant to Local Rule 56.1 (Docket #s 81 and 83)**

To the Clerk of Court:

Please find enclosed for filing **under seal** in the above-captioned matter Exhibit #55
(Detention Center Morning Report dated 7/28/99) to Schedule of Exhibits in Support of the
above-named documents, which were filed today electronically.

Please also find enclosed the following exhibits, which we attempted to file
electronically, but were not able to do so. (With respect to Exhibit #39, we received a message

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that the file was corrupt. With respect to the other exhibits, the system shut us out, perhaps because the files were too long.)

Ex. # Description

- 39. Plaintiff's Letter to Defendants' Counsel dated 06/11/02
 - 56. Excerpts from First Deposition of Sandra Brulo, dated 7/31/02
 - 58. Excerpts from First Deposition of Louis Kwarcinski, dated 7/30/02
 - 61. Excerpts from Deposition of Jerome Prawdzik, dated 8/20/02
 - 66. Excerpts from Deposition of Mark Puffenberger, M.D., dated 11/19/02
 - 67. Excerpts from First Deposition of Elaine Yozviak, dated 2/14/03
 - 70. Excerpts from Deposition of John DeAngelo, dated 9/24/02
 - 71. Excerpts from Deposition of Greg Kahn, dated 9/24/02
 - 72. Excerpts from Deposition of K.K. (Plaintiff's stepfather), dated 5/15/02
-
- 73. Incident Report by Hutchins dated 8/9/99 (previously marked P-39 in depositions)
 - 74. Incident report by Pavlick dated 8/6/99 (previously marked P-23B in depositions)
 - 75. Incident report by Traver dated 8/16/99 (previously marked P-40 in depositions)

The remainder of the exhibits were filed today electronically. If you have any questions, please contact attorney Rosado at 215-625-0551. Thank you for your attention to this matter.

Sincerely,



Marsha Levick, Esq.
 Lourdes Rosado, Esq.
 ATTORNEYS FOR PLAINTIFF

Enclosures

Ex. 61 to
Pl.'s Resp. to Defs.
Summ. J. Mot.

U.S. DISTRICT CO

DISTRICT OF PENNSYLVANIA

* * * * *

A M , *

Plaintiff * Case No.

vs. * 3:CVR-01-1276

LUZERNE COUNTY *

DETENTION CENTER, *

Defendant *

* * * * *

DEPOSITION OF
JEROME PRAWDSIK
August 20, 2002

FILED
SCRANTON

APR 11 2003

PER 
DEPUTY CLERK

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1 then to the parents.

2 Q. If the child needed to be
3 disciplined, was that discipline
4 carried out by the child care
5 workers?

6 A. They would write an incident
7 report and that would go through me
8 and then through the chief.

9 Q. And what was your role in the
10 path of that incident report?

11 A. I would give it to the chief.

12 Q. And what would the chief do?
13 And by chief I assume you mean the
14 chief probation officer?

15 A. Yes.

16 Q. What would the chief do with
17 that incident report?

18 A. Decide what should be done.

19 Q. So is it fair to characterize
20 your role when you were hired in 1978
21 as just an administrator of the
22 detention center? And if you don't
23 understand what I mean I'll explain
24 that.

25 A. If you could.

1 became a requirement.

2 Q. Do you recall when that was?

3 A. A few years ago. I don't know
4 exactly when.

5 Q. By the way, today you report
6 to Mr. Kwarcinski; is that correct?

7 A. Yes.

8 Q. And you have reported to him
9 directly, do you recall, for how
10 long?

11 A. Since the '80s. I don't know
12 exactly when.

13 Q. Okay. But sometime since the
14 '80s?

15 A. Yes.

16 Q. Do you still consider yourself
17 a court employee?

18 A. Yes.

19 Q. When you undergo training,
20 this annual training of 40 hours a
21 year, first of all, how is that
22 training set up? Do you schedule the
23 training yourself or is it scheduled
24 for you?

25 A. Well, it's scheduled, but we

1 first, have you taken that course?

2 A. Yes.

3 Q. Okay. And again, that would
4 not be a required course, that would
5 be a course that you would elect to
6 take; is that correct?

7 A. Yes.

8 Q. And what do you recall about
9 that course, the subject matter and
10 content?

11 A. Just talk to them. You've got
12 to deal with them, watch them, look
13 for signs, have them seen by crisis
14 when necessary.

15 Q. What's your understanding of
16 when it would be appropriate to call
17 in crisis?

18 A. Just by their actions and
19 behavior, you know, suicidal.

20 Q. And their attitude and
21 behavior, such as ---?

22 A. It's hard to say, you know.

23 Q. Well, let me ask you this
24 question. You supervise the child
25 care workers; correct?

1 A. Yes.

2 Q. And the child care workers; is
3 it fair to say, have the most amount
4 of contact with the children in the
5 center?

6 A. Yes.

7 Q. That's correct?

8 A. Yes.

9 Q. Do you have meetings with
10 child care workers where you discuss
11 how to deal, for example, with
12 children who have mental health
13 problems in the center?

14 A. If there's a person that's
15 coming in who has a mental health
16 problem, we ---.

17 Q. What would you say to the
18 child care staff about that child?

19 A. We'll have to keep a special
20 watch on that person.

21 Q. And what does that mean by
22 special watch?

23 A. Well, during the evening he
24 would be put on a suicide watch and
25 someone would be with him for the

1 evening, you know, outside his door,
2 watching, on a suicide watch,
3 monitoring him.

4 Q. Any other special instructions
5 that you would give the child care
6 staff?

7 A. That would be it.

8 Q. That would be it, just a
9 suicide watch. Have you been offered
10 courses in types of children who are
11 particularly vulnerable in a
12 detention or correctional setting who
13 are most likely, perhaps, to be
14 victimized by the children?

15 A. Not that I recall.

16 Q. And you don't recall taking
17 any courses in that either?

18 A. No.

19 Q. Other than post-traumatic
20 stress disorder and what sounds like
21 --- and correct me if I'm wrong --- a
22 general mental health juvenile
23 justice course, have you been offered
24 any other courses that looked at
25 other specific kinds of mental health

1 disorders?

2 A. Not really.

3 Q. No. And you haven't taken any
4 courses?

5 A. No.

6 Q. What about courses involving
7 de-escalating conflicts between
8 children? Have you taken courses in
9 that?

10 A. No.

11 Q. Have you been offered any
12 courses in that; do you recall?

13 A. I can't recall.

14 Q. You've described this safe
15 physical management, which I
16 understand you to say refers really
17 to physical restraint; is that
18 correct?

19 A. Yes, that's it.

20 Q. Is that also chemical or
21 mechanical restraints?

22 A. No. No chemical, no
23 mechanical.

24 Q. So physical is really just
25 your --- a worker's strength? You're

1 that? Is there anything in the
2 manual that speaks to that?

3 A. I don't know.

4 Q. You don't know. If two
5 residents are fighting with each
6 other, is there anything in the
7 manual that provides guidance or sets
8 up a protocol for how to deal with
9 that?

10 A. They would be restrained and
11 the supervisor would be made aware of
12 it.

13 Q. Is that in the manual? Is
14 that in writing in the manual?

15 A. If it's not in the manual,
16 it's in the --- we have a memo --- a
17 book, also, of memos and they are,
18 you know, directed to the personnel,
19 as to what's expected of them. And
20 those manuals are kept up in both
21 quarters, too. And it would be in
22 there, if not.

23 Q. Okay. Let me make sure I
24 understand you. What you're saying
25 is that there are memos that are

1 A. Yes.

2 Q. And you have a binder for the
3 year 2002?

4 A. Yes.

5 Q. What happens to the binders
6 for '99, '98, '97? What happens to
7 them?

8 A. I don't think we had that back
9 then, where we had binders, to be
10 quite honest with you. It's
11 something new that we - - -.

12 Q. Okay. Well, you've been at
13 the detention center a long time, so
14 you don't recall having these binders
15 prior to the year of 2000?

16 A. No, we just started it. Yes.
17 That's a new procedure.

18 Q. What was the procedure prior
19 to 2000?

20 A. Well, memos were issued, but
21 they didn't - - - they were filed.

22 Q. Where would they have been
23 filed?

24 A. Just in - - - in the '99
25 material.

- 1 A. Yeah, like a tray.
- 2 Q. A tray?
- 3 A. Yes, where you can put things
- 4 in it.
- 5 Q. Where were the trays
- 6 maintained?
- 7 A. In the dayroom.
- 8 Q. Was this the upstairs dayroom
- 9 or the downstairs dayroom?
- 10 A. Downstairs dayroom. Each one
- 11 has their name on it, you know.
- 12 Q. Is that how it's done today?
- 13 A. Yes.
- 14 Q. I see. But it's not ---?
- 15 A. I don't know if it started in
- 16 '99 or not. I'm not sure.
- 17 Q. Okay. Now, let's go back to
- 18 the policies and procedures manual.
- 19 You've testified, I believe, that
- 20 there was no written protocol in the
- 21 policies and procedures manual for
- 22 dealing, for example, with a child
- 23 who is being victimized at the
- 24 detention center?
- 25 A. Not that I recall.

1 Q. And I believe you testified,
2 and this is how we got into the
3 discussion of memos, that you don't
4 recall that there was a written
5 protocol for dealing with two
6 children who were fighting with each
7 other, in the policies and procedures
8 manual; is that correct?

9 A. Yes.

10 Q. Do you recall whether or not
11 there was a written protocol in the
12 policy and procedures manual for
13 dealing with children who were sex
14 offenders who came into the facility?

15 A. Well, if it was a known sex
16 offender, they would keep like a
17 special watch on them.

18 Q. And who decided to keep a
19 special watch on them?

20 A. Myself, Mr. Kwarcinski or Mr.
21 Doran.

22 Q. Was this policy at the
23 detention center?

24 A. It was our policy, if they
25 were, you know, sex offenders, to

1 who are sex offenders?

2 A. No.

3 Q. And how do you communicate to
4 the staff that a child is a sex
5 offender?

6 A. Verbally and sometimes
7 written.

8 Q. I missed the end of your
9 sentence.

10 A. Verbally or through a memo.

11 Q. Or through a memo?

12 A. Yes.

13 Q. Now, when A. t. M
14 came to the detention center in the
15 summer of '99, did you consider him
16 to be a sex offender?

17 A. I'm not a --- I mean --- I
18 don't remember.

19 Q. You don't remember whether he
20 was or wasn't?

21 A. No, I didn't.

22 Q. Do you recall any specific
23 meetings about Antonio?

24 A. No.

25 Q. Do you recall learning about

1 Q. Well, how does the nurse know
2 to keep this material locked?

3 A. She's instructed. She's told
4 to.

5 Q. By who?

6 A. By management.

7 Q. Again, management being
8 yourself?

9 A. Yes.

10 Q. Would Mr. Kwarcinski instruct
11 her to that effect?

12 A. Possibly.

13 Q. Would Ms. Brulo?

14 A. Possibly.

15 Q. Is there anything in the
16 policy and procedures manual that
17 instructs her to that effect?

18 A. I'm not sure.

19 Q. Now, when the nurse fills out
20 one of these forms with the doctor
21 and she notes, as she did on Exhibit
22 28, eight hospitalizations for
23 behavior and then three additional
24 hospitalizations for behavior noted
25 under that, what would she be

1 the log.

2 Q. Let me ask you something about
3 --- some questions about keeping
4 track of the population. Is there
5 anything in the policy and procedures
6 manual that, in writing, speaks to
7 knowing where the population is at
8 all times?

9 A. Yes.

10 Q. Yes?

11 A. They're always with a child
12 care worker. At no point in time are
13 they left without a child care
14 worker. So they're with them at all
15 times.

16 Q. The population is with the
17 child care worker at all times?

18 A. Yes.

19 Q. Okay. What about keeping
20 track of the comings and goings of
21 the children? How do you keep track
22 of that?

23 A. When they're released or ---?

24 Q. Within the facility. If they
25 go to a meal or they go out for

1 A. No.

2 Q. You don't recall any unusual
3 meetings involving child care workers
4 at the detention center management to
5 talk about him?

6 A. No.

7 Q. You don't recall any
8 discussions about whether an outside
9 mental health consultant should be
10 called to help staff deal with

11 M ?

12 A. No.

13 Q. Do you recall a memo
14 instructing that A M. be
15 placed on the girls' side for the
16 majority of the time?

17 A. No.

18 Q. Do you recall seeing this memo
19 before today?

20 A. I can't say I've seen it. I
21 can't really recall, you know, three
22 years ago, but I ---.

23 Q. Do you recall what date, what
24 weeks you were on vacation that
25 summer?

1 A. I have it written down.

2 Q. Okay.

3 A. From 7/17 to 8/2.

4 Q. So you were on vacation on the
5 date that this memo was written;
6 correct?

7 A. Yes.

8 Q. What would your practice have
9 been when you returned from vacation?

10 A. When I looked at everything
11 that was in my mailbox, I would see
12 that this would've been in there.

13 Q. But you don't recall actually
14 going and talking to Mr. Kwarcinski
15 about the content of the memo; is
16 that correct?

17 A. No. But he was in girls'
18 quarters during this time. That's --
19 - .

20 Q. What would you understand the
21 majority of his time to be, by the
22 way, since this obviously would have
23 been carried forward and there would
24 have been instruction to you when you
25 came back from vacation. What did

1 that mean to you?

2 A. You mean what did that ---?

3 Q. Majority of his time?

4 A. Awake hours he was with the
5 girls.

6 Q. So awakening, pretty much from
7 breakfast until after dinner?

8 A. Yes, until they go to bed.

9 Q. And I assume, based on your
10 prior testimony, it's fair to say
11 that that would be noted in the log?

12 A. Yes.

13 Q. As to comings and goings? And
14 by that I mean if he went to the
15 girls' unit after breakfast on August
16 1st, it should have been in the log;
17 correct?

18 A. It should have been, yes.

19 Q. And if he came back after
20 dinner it should have been in the
21 log; correct?

22 A. Yes.

23 Q. There's a reference in this
24 memo that A should be reminded
25 not to discuss the nature of his

1 charges with the other children. Do
2 you recall anything about that being
3 an issue, why that would be in the
4 memo?

5 A. No.

6 Q. Did you interview and make
7 recommendations with regard to the
8 hiring of child care staff?

9 A. Recommendations on hiring?

10 Q. Yes. I know I probably said
11 that in the past tense. Do you
12 interview candidates for the position
13 of child care worker?

14 A. I might sit in on an
15 interview, but I, you know, ---.

16 Q. It's not your primary
17 responsibility?

18 A. No.

19 Q. Whose primary responsibility
20 is it to do the interviewing?

21 A. Chief, deputy chief.

22 Q. Chief of probation?

23 A. No, the deputy chief.

24 Q. Or the deputy chief, which
25 would be Mr. Kwarcinski?

1 A. Yes.

2 Q. Why would they do the
3 interviewing when these people
4 actually report directly to you? Why
5 was it set up that way?

6 A. I have no idea.

7 Q. Is it fair to say then that
8 your involvement in interviewing is
9 ---?

10 A. Minimal.

11 Q. Minimal. Okay. And
12 definitely not part of your job
13 requirements or responsibilities?

14 A. No.

15 Q. Who decides what staff
16 training the staff are going to
17 undertake?

18 A. Now?

19 Q. Well, you can answer the
20 question as to now, yes.

21 A. Right now they do.

22 Q. I'm sorry?

23 A. Themselves.

24 Q. They decide?

25 A. Yes. They have the training,

1 made out and then it's given, right
2 now to either myself or Mr. Doran
3 this point in time.

4 Q. Right. What happened in 1999?

5 A. It would go to Mr. Kwarcinski.

6 Q. The incident report?

7 A. Yes.

8 Q. So a copy was put in the
9 child's file in 1999; is that
10 correct?

11 A. Mr. Kwarcinski would get it,
12 review it, and then it would go back
13 and be put in his file.

14 Q. So the procedure in 1999 is
15 that actually the copy went to Mr.
16 Kwarcinski first?

17 A. Uh-huh (yes).

18 Q. And you were not necessarily
19 in that loop at all?

20 A. Well, Mr. Kwarcinski would
21 tell me, would I care to look at it?

22 Q. Every incident report?

23 A. Almost, I couldn't say
24 definitely every.

25 Q. Well, you didn't have an

1 expectation that every incident
2 report would be shared with you; is
3 that correct?

4 A. Quite possibly. It didn't
5 really involve me.

6 Q. As the detention supervisor in
7 1999 and the only detention
8 supervisor in 1999, what incident
9 would not involve you? What kind of
10 an incident report would not involve
11 you?

12 A. Well, something if an incident
13 was made up --- say a person, you
14 know, for instance, a phone call. If
15 he would, instead of calling, making
16 a phone call to his mother, and here
17 the phone number wasn't exactly his
18 mother's, and it was, you know --- he
19 called somebody else like a
20 girlfriend or whatever
21 take, for instance, you know, that
22 would be directed to Mr. Kwarcinski.
23 He would you know, deal with that.
24 Q. What would Mr. Kwarcinski do
25 with that information?

1 Q. Were child care workers
2 instructed to make notes at these
3 shift change meetings?

4 A. No.

5 Q. And is it your impression, or
6 to your knowledge, in fact, that they
7 didn't make notes?

8 A. Yes. They didn't?

9 Q. They did not make notes.

10 A. Yes.

11 Q. Okay. When new workers came
12 to the detention center, they
13 underwent an orientation; is that
14 correct?

15 A. Yes.

16 Q. And were you responsible for
17 conducting that orientation?

18 A. Mr. Kwarcinski would, and
19 myself, sit down with them for a day
20 and go over everything.

21 Q. Both of you together; is that
22 correct?

23 A. Not necessarily. One might do
24 it and not the other.

25 Q. I'm going to ask you to take a

1 look at Plaintiff's Exhibit 12. Do
2 you recognize the document?

3 A. Yes.

4 Q. And is this the orientation
5 schedule that was in use?

6 A. As soon as they start.

7 Q. Was this in use in 1999?

8 A. Yes.

9 Q. Has it changed, to your
10 knowledge?

11 A. No.

12 Q. So this was a one-day event;
13 is that correct?

14 A. Uh-huh (yes).

15 Q. And you would go over each
16 item on here over the course of the
17 day?

18 A. Yes.

19 Q. Okay. Was this the first day
20 of work? How did you go about doing
21 this? Did they do it before they
22 actually reported to work?

23 A. No, first day of work.

24 Q. First day at work. Is this
25 when they would be given a copy of

1 employees?

2 A. Yes.

3 Q. Anything in addition to that
4 handed to them in ---.

5 A. No.

6 Q. So most of this orientation
7 would actually be done verbally by
8 either you or Mr. Kwarcinski or both
9 of you; is that correct?

10 A. Uh-huh (yes).

11 Q. I may have asked you this.
12 I'm sorry. I don't remember. Did
13 you review the log every day?

14 A. Excuse me?

15 Q. Did you review the log every
16 day?

17 A. No.

18 Q. When would you review it, or
19 under what circumstances would you
20 review it?

21 A. If an incident took place and
22 I wanted to read about it.

23 Q. So you would have to have
24 heard about something from either a
25 child care worker or Mr. Kwarcinski

1 or Ms. Brulo in order for you to
2 decide to review the log on your own;
3 is that correct?

4 A. Yes.

5 Q. But you wouldn't do it as a
6 matter of your routine job
7 responsibility?

8 A. No.

9 Q. Is there a census? And what I
10 mean by that, on any given day do you
11 have a list of who's in the detention
12 center?

13 A. Every morning they do a
14 morning report of what's going on.
15 And it requires a list of this ---.

16 Q. Who's there that day?

17 A. Yes.

18 Q. Do you do an evening report to
19 the extent that kids have come in or
20 have been released?

21 A. Morning report.

22 Q. Only a morning report?

23 A. Yes.

24 Q. And if kids have come and gone
25 during the day, meaning just released

1 respect to A staying at the
2 detention center?

3 A. No.

4 Q. This is something that you
5 would expect to be brought to your
6 attention though; is that correct?

7 A. Yes.

8 Q. And ---?

9 A. I can't recall. That's what I
10 mean.

11 Q. Okay. You don't recall it but
12 you'd expect it to brought to your
13 attention, yes?

14 A. Yes.

15 Q. And would you expect Mr.
16 Kwarcinski to bring it to your
17 attention or a child care worker?

18 A. Mr. Kwarcinski.

19 Q. Would you be responsible
20 for --- to the extent there's some
21 issue obviously about staff placement
22 in the detention center, or who's
23 with A at a given time, is this
24 a decision that you would make as a
25 supervisor to the child care workers?

1 A. Mr. Kwarcinski.

2 Q. Mr. Kwarcinski would make it?

3 A. Uh-huh (yes).

4 Q. Why would he make it rather
5 than you?

6 A. He's a deputy chief, you know,
7 and he made that decision.

8 Q. But what about the actual
9 assigning of the child care workers
10 to sit with A for the next
11 hour. Who would make that decision?
12 Would you make that decision, or Mr.
13 Kwarcinski?

14 A. Mr. Kwarcinski.

15 Q. Even though setting up shifts
16 is your job?

17 A. Scheduling, yes.

18 Q. Scheduling is your job. But
19 something like this would be Mr.
20 Kwarcinski's job to take whatever
21 schedule you set up and to tinker
22 with it with respect to supervising
23 Anthony?

24 A. Including people who were
25 scheduled for that shift anyway.

1 Q. Well, I'm trying to understand
2 that this appears to direct that
3 A is in the detention center,
4 certainly, on this date, that he is
5 to be separated. And you've
6 described separated as being
7 essentially one on one with the child
8 care worker at all times; is that
9 correct?

10 A. That he would be with you at
11 all times is vital, yes.

12 Q. And by himself; correct?
13 Separated means not with the general
14 population.

15 A. Separated we're in this room
16 here, population might be sitting
17 here (indicating). You'd be sitting
18 over here with me, separated from the
19 population.

20 Q. Okay. So my question is
21 whether or not some specific
22 designation of --- if there are two
23 child care workers on that day
24 supervising that population, would
25 Mr. Kwarcinski or would you decide

1 Q. Is there any other type of
2 special medical or mental health
3 assistance that they might seek for a
4 child where they wouldn't first
5 contact you or Mr. Kwarcinski or Ms.
6 Brulo in your absence?

7 A. No.

8 Q. None? So any special
9 attention that a child needed above
10 and beyond routine supervision would
11 require clearance from you or Mr.
12 Kwarcinski or Ms. Brulo; is that
13 correct?

14 A. Yes.

15 Q. Do you ever remember meeting

16 A. M ' mother or
17 stepfather during the time he was in
18 detention?

19 A. No.

20 Q. Do you recall receiving any
21 telephone calls from them?

22 A. No.

23 Q. Do you have any recollection
24 of ever having a conversation with

25 A. M ?